



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

US EPA RECORDS CENTER REGION 5



467821

REPLY TO THE ATTENTION OF: SR-6J

August 16, 2011

Thomas W. Steib
Operations Manager
Detrex Chemicals Division
Elco Corporation
1100 N. State Road
Ashtabula, OH 44004

Re: Transmittal of Review Comments
Additional Excavation of DS Tributary Work Plan (Revised
Detrex Source Control Area – Fields Brook Superfund Site
URS Corp., August 2, 2011

Dear Mr Steib:

EPA has completed its review of the above referenced document. Except as noted in the following comments, the work plan is approved. Please provide responses to the comments along with the corresponding Work Plan revisions.

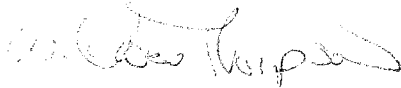
1. Detrex requested EPA to consider whether excavated soils could be placed in the Detrex Source Area. Since the DS Tributary west of State Road is not located on Detrex property, it is not considered "on-site" for the purposes of the RCRA on-site management exemption. The excavated materials will have to be disposed of off-site.
2. Note 1 on Figure 1 states that the existing DNAPL collection trenches will be removed with the excavation. Will these be replaced with new ones? If so, please modify the Figure to show the planned new locations.
3. Please add an additional "Restored Plan" detail to Figure 2 to show a side elevation of the area at the west end of the State Road culvert as it empties into the DS Trib, which indicates how the Aqua-Blok and cover materials will be tied into the existing structure.

4. Provide clarification as to how deep the proposed excavation is: to excavate all materials that contained free liquid DNAPL, regardless of depth DNAPL is encountered; or to no deeper than 6 ft below ground surface.

We understand that URS is planning some additional investigative work in and upstream of the State Road culvert in response to some recent information provided by the FBAG. While, these two projects can proceed independently and there is no need to delay the additional DS Trib excavation work at this time, depending on the result of the investigation, additional excavation work may be required.

I can be reached by phone at 312 886-4843 if you have any questions.

Sincerely,



W. Owen Thompson
Remedial Project Manager
Superfund Division

cc: Peter Felitti, U.S. EPA C-14J
William Earle, SulTRAC
Robert Currie, Detrex
Martin Schmidt, URS